

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

NATHANIEL BUTLER-LUDWIG

Defendant.

No. 23 CR 537

Hon. John F. Kness

***UNOPPOSED* DEFENDANT'S MOTION TO MODIFY
CONDITIONS OF RELEASE**

Nathaniel Butler-Ludwig, by his attorney, respectfully requests this Court to enter an Order modifying his conditions of release to allow Defendant to travel to Dawson, Illinois, from September 17, 2024 through September 19, 2024. Defendant states the following in support:

1. An indictment charges Nathaniel Butler-Ludwig with one count of possession with intent to distribute Methylenedioxymethamphetamine, in violation of 18 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.
2. The Court placed Defendant on pretrial release with on an unsecured \$5,000 bond with conditions. Specifically, the Court restricted Defendant's movement within the Northern District of Illinois. Defendant has timely showed up to each court date that required his attendance.
3. Defendant requests permission to travel to visit his grandparents in Dawson, Illinois from September 17, 2024, through September 19, 2024.
4. Defense counsel has conferred with the government who advised it has no

objection. Pretrial Services advised it has no objection.

Wherefore, Defendant respectfully requests that his conditions of release be modified to allow Defendant travel to Dawson, Illinois from September 17, 2024 through September 19, 2024, and any other equitable relief that this Court deems just and appropriate.

Dated: August 29, 2024

Respectfully Submitted,

By: /s/ Thomas M. Breen

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that the foregoing document was served on **September 2, 2024**, in accordance with Federal Rule of Criminal Procedure 49, Federal Rule of Civil Procedure 5, Local Rule 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

By: /s/ Thomas M. Breen